

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM-10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments of Larry Myers – Callsign KD5VWS

I had my first introduction to Morse Code as a Queen Scout in Canada in 1955. Morse was used little at that time and now, forty-five years later, it is hard to believe Morse is still a requirement in amateur radio. Times and technology have changed dramatically over the years, and all of the previously claimed reasons for requiring Morse proficiency of all amateur radio operators have disappeared. Virtually no government or commercial radio services use Morse telegraphy in today's world.

The historical need of the government, commercial, and maritime services for a "pool of (Morse) trained operators" has ceased to exist and the Morse skill is no longer required for effective emergency communication by amateur operators. The maintenance of Morse proficiency tests as a requirement for any amateur radio license is no longer in accord with the purpose of the amateur radio service and serves no legitimate regulatory purpose.

The Commission concluded in WT Docket No. 98-143 that the public interest will best be served by reducing the Morse telegraphy examination requirement to the minimum requirement that meets the ITU Radio Regulations. The “minimum requirement that meets the ITU Radio Regulations” for any class of amateur license is now no Morse test at all.

Since the Commission is no longer bound by an unwaivable requirement in the ITU Radio Regulation, it can, and should, act promptly to remove any unnecessary, restrictive requirements. Other administrations (Switzerland, The United Kingdom, Belgium, Germany, The Netherlands, and Norway) have already eliminated Morse test requirements and many more are expected to follow suit rapidly.

The Commission’s own determinations, as well as a significant body of public comment from proceedings in both 1990 and 1999, clearly demonstrate that Morse proficiency test requirements are unnecessary and undesirable in that it does not comport with the basis and purpose of the Amateur Radio Service; it is not necessarily indicative of an individual’s ability to contribute to the advancement of the radio art; it does not provide any indication of the examinee’s good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission’s rules; it no longer continues to serve a regulatory purpose; and it otherwise does not serve the public interest and necessity.

In summary, for all the reasons outlined and referenced herein, it is clearly within the Commission's authority to enact the following changes to its rules in the most expeditious manner possible: First, eliminate the "Element I" Morse test totally from the Commission's rules for all license classes; and, second, since the only testing distinction between the Technician Class and the (grandfathered) Technician Plus Class is the "Element I" Morse test, modify as a consequential and logical change the privileges afforded the Technician Class licensees to be equivalent to those currently afforded the Technician Plus licensees and Technician with Morse Credit licensees.

Respectfully submitted,

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